

REMARKS

Applicants reply to the Examiner's comments in the Advisory Action mailed on December 15, 2006, and submit these remarks. Applicants request that the Examiner consider the following remarks prior to examining the above-referenced patent application after RCE. Claims 36-48 were pending in the application and the Examiner rejects claims 36-48. Applicants assert that the application is in condition for allowance and reconsideration of the pending claims is requested.

Examiner Comments in the Advisory Action

Regarding Applicants' previously filed arguments differentiating the claims from the cited references, the Examiner notes that, "the features upon which applicant relies (i.e., intensive processing, partition of relational databases according to keys) are not recited in the claim(s)" (page 2, paragraph 2).

Applicants note that intensive processing and partition of relational databases according to keys are not features relied on by Applicants to differentiate from the cited references at this time. These features are not recited by the claims because they were presented only to demonstrate the differentiating features of the present invention over the cited references. In the previously filed Reply, Applicants pointed out the architectural features of Shein in light of the presently claimed invention; and notably, that the system of Shein would be incapable of performing the required steps as disclosed in the claims. For example, Applicants noted that the relational database as disclosed by Shein is, "much more complex than object databases, so searching the relational database of Shein is much more complex because (i) the user needs to formulate more complex search algorithms to search the database; and (ii) the numerous linkages between tables requires more intensive processing of the numerous links." Thus, "intensive processing" is not a feature that Applicants are attempting to claim. To the contrary, it is the structure of the objects as claimed that overcome the limitations of the cited references, which themselves require "intensive processing" due to the use of relational databases.

In regard to Applicants' recitation relating to the partitioning of relational databases according to keys, Applicants note that such partitioning is not a feature upon which Applicant relies. Again, the arguments in the previously filed Reply relate to the complex linkages required by the cited references. Specifically, the arguments were presented to differentiate the presently claimed invention over Shein and Owens, wherein each of these cited references disclose the complex linkages that are inherent to relational databases. To the contrary, Applicants' claims disclose a unique object structure for

managing multiple credit instruments, without requiring the partitioning of relational databases according to keys.

The Examiner further asserts that the Applicants' arguments relating to the efficient use of an object database with a one-to-one relationship between objects and products is, "a recitation of intended use of the claimed invention [that] must result in a structural difference between the claimed invention and the prior art" (page 2, paragraph 3). Applicants assert that one of ordinary skill would appreciate that the structural difference of the claimed invention from the cited references is substantial and produces a result that would not be otherwise possible under the cited references. Applicants previously filed arguments were not directed to the efficient use of a relational database; rather, to the advantages of the claimed object structure in maintaining multiple products in light of the systems disclosed by the cited references.

The Examiner next asserts that the Applicants' arguments were directed against the references individually, and that "one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references" (page 2, paragraph 4). Applicants respectfully assert that the arguments were presented against the combined references ("nor any combination thereof").

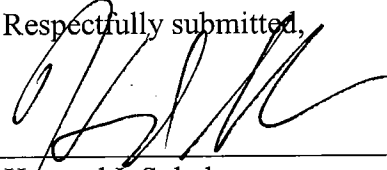
To summarize the arguments presented in the previously filed reply, Applicants assert that Shein discloses a system and method for integrating data relating to customer transaction accounts based on a customer's relationship with a financial institution. While Shein discloses storing data in a relational database, Shein admits that performing a search on data within a, "database of this size cannot be practically or directly searched" (Shein, col. 11, lines 11-19).

In relation to the use of database stored objects structures according to the presently claimed invention, the Examiner cited Owens as disclosing the use of a relational database in an object oriented design. Applicants note that, as in Shein, Owens discloses a relational database structure that is maintained through the implementation of an Object Oriented (OO) program. The Examiner relied on Owens to disclose a feature not found in Shein (i.e., first, second, and third high level classes). Thus, Applicants argue that, as in Shein, Owens discloses storing data within a relational database. Contrary to Applicants' presently claimed invention, the combination of Shein and Owens disclose a system quite different than Applicants' invention. Applicants first described each reference individually, and then argued against the combined disclosures of Shein and Owens in stating that, "neither Schein, Owens, **nor any combination thereof**, disclose or suggest at least a, 'second subsection containing a

high-level secondary class of objects and a second plurality of secondary classes of objects derived from said high-level secondary class of objects, wherein each of said second plurality of secondary classes of objects define one of said plurality of stored value products; and, wherein said second plurality of secondary classes of objects inherit attributes from said high-level key class of objects,' as recited by independent claim 36" (emphasis added).

In view of the above remarks and amendments, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and are allowable over the cited references. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject Application. Applicants authorize and respectfully request that any fees due be charged to Deposit Account No. 19-2814, including any required extension fees.

Respectfully submitted,



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